



Defense Threat Reduction Agency
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December 23, 1998

MEMORANDUM FOR Assistant Secretary of Defense for Reserve Affairs
ATTN: LTC Wendell Nierman

SUBJECT: DTRA comments on the draft National Guard Report to the Congress of the United States of America Weapons of Mass Destruction (WMD) Study


Reference: Verbal tasking by Mr. Charles Cragin, ASD(RA) at the December 17th meeting of the Assistance to State and Local Authorities Subgroup.

In response to Mr. Cragin's tasking of December 17th, DTRA has provided the attached comments on the National Guard WMD Study.

Generally, the Study needs to reflect a better understanding of current DoD, DoE, industry, and academia research, development, and acquisition programs and processes. Recommend the Study evaluate the capabilities and responsibilities of the interagency Technical Support Working Group (TSWG), specifically the working group for Chemical, Biological, Radiological, and Nuclear (CBRN). The Study should also evaluate potential synergies with the DoD Chemical and Biological Defense Program (CBDP).

The study also needs to separate the acquisition processes that apply for DoD and civilian entities. The National Guard, like all of the services, should approach the Joint NBC Defense Board with their requirements for validation and prioritization, as stated in Public Law 103-160 and the Joint Service Agreement which governs this organization and process.

DTRA appreciates the opportunity to comment. Request DTRA be informed of further iterations of the Study. It is important work, which has been given a difficult, comprehensive charter.


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*DTRA Comments on the National Guard WMD Study***General Comments**

- Recommend changing the reference from WMD to "Chemical and Biological," as nuclear, radiological, electromagnetic pulse, and high-frequency bursts are not dealt with in the Study.
- Recommend a reorganization of the volumes.
 - Trim the Executive Summary to a description of the validated National Guard (NG) roles and the proposed packages.
 - Delete the details of the iterative process that no longer have any bearing. For example, those roles originally proposed can be placed in an appendix with a brief description of why they were or were not accepted.
 - Reduce duplication in the Executive Summary and throughout the text. First, there are errors when one refers between the duplicative sections. Second, the report loses its clarity.
- Most importantly, the document needs to take into account the developments in WMD Terrorism Response since the Study was commissioned. This includes the formation of the National Domestic Preparedness Office (NDPO) in the Department of Justice (DoJ), the transfer of the Domestic Preparedness Program (DPP) to the DoJ, and the issuance of PDD-62 and its incorporation across the interagency.

Specific Comments

The following specific comments on the proposed roles for the National Guard take into account the additional document provided with the Study. (Attached at TAB C)

- **Role 2** Interagency Coordinator (pp. xxxvi, 21, and 25)—This role is duplicative of the PDD-62 Management groups at the NSC and DoD levels. Further, the NSC has policy oversight and is charged to eliminate the agency overlaps. Recommend deletion.
- **Role 3**—Dual-Use Watchdog (pp. xxxvii, 21, and 25)—Role is specifically identified (p. 25) as monitoring the CB science and technology base. Duplicative of CBRN, TSWG, SBCCOM, DARPA, and DoE. Recommend deletion.
- **Role 5**—Requirements Aggregation (pp. xxxvii, 21, and 25)—Described (p. 25) as a role to collect requirements of the military and civilians from exercises, training, and joint operations. The NG RAIDs will have a seat at the TSWG, Chemical, Biological, and Radiological (CBRN) Subgroup, providing them a forum to provide feedback from the field. The discussion and language here neglects the distinction separating the RDA processes for the services and civilians. Recommend that the NG use the TSWG to provide operational perspective in the requirements generating process for civilians. Further recommend that the NG, in accordance with P.L. 103-160, provide their requirements to the Joint NBC Defense Board for action. Recommend Role 5 be redrafted to account for these comments.

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- Roles 9, 10, 24, and 26—Modeling and Simulation Certification (pp. xxvii, 21-22, and 26-27)—Recommend deletion of role as the National Guard does not have the expertise, and it is duplicative of existing DoE, DMSO, JNBCDB CAM, DTRA, FEMA, and FBI.
- Roles 11 and 12—Standard Buy List or Procurement Services (pp. xxvii, 22, and 26)—In the supplementary document, the role in the Standard Buy List was dropped, presumably in favor of the DoJ. The second half, procurement services, is being managed now by DOMS under the SecArmy. The National Guard has some staff involved in this activity, however it is recommended that the effort remain in DOMS. Further, the NDPO could take this role absolving DoD of the administrative burden and costs.
- Role 15—Exercise Automation Support (pp. xxvii, 22, and 27)—Training and exercising is the role of the NDPO and DoJ. DoD may support these activities, probably on a case by case basis. The NG identification of this role needs to reflect it as task dependent, which needs to be coordinated with the appropriate PDD-62 Management Subgroup.
- Roles 20, 22, and 25 (pp. xxviii, 22, and 27-28)—Threat Information Processing and Dissemination—The National Guard is proposing a role that conflicts with the responsibilities of the FBI. While the linkage between the Federal Agencies and locals could be improved, the NG is not the logical institution. Recommend deletion.
- Role 34—Track Exposed Individuals (pp. xxxviii, 23, and 29)—This proposed role duplicates the responsibility of county health departments and the mandate of the Public Health Service. Recommend deletion.
- Role 42—Vulnerability Assessment Assistance (pp. xxxviii, 23, and 30)—The National Guard has no clearly identified capabilities to accomplish this mission, further, there is no clear need. Management of such an undertaking would be difficult due to reimbursement issues, access of federal military personnel to civilian facilities and private property, and the duplication of other federal programs. Assessments of civilian facilities is not a DoD mission. Recommend deletion.
- Role 46—Augment Firefighters (pp. xxxix, 46, and 31)—This is a traditional role of the NG in the instance of forest fires and other natural disasters. However, in a WMD response plan its identification as a role is unnecessary. Recommend deletion from this study.
- Role 51—Distribute Consumable Resources (pp. xxxix, 23, and 31)—Recommend caution in identifying this as a potential role, as it needs to match the Federal Emergency Response Plan (and its Appendix on WMD), and not duplicate other federal agencies (HHS, FEMA, DoJ).
- Role 57—Decontaminate Hot Zone and Affected Areas (pp. xxxix, 24, and 32)—This potentially valid role was omitted in the supplementary document. Urge the NG reconsider this role, as the NG can provide protected personnel in the personnel and labor intensive effort of mass decontamination.

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- **Role 66—Manage Distribution of Mass Care Supplies (pp. xl, 24, and 33)**—There are many other organizations involved, and the Federal responsibility for their coordination falls under FEMA. Recommend that the study identify the gaps in this area but not a NG role.
- **Role 69—Provide Specialized Training for Equipment Use (pp. xl, 24, and 34)**—The NG will in many cases be part of the last personnel trained to use latest military issued equipment. Study should identify competing federal and military organizations that could provide the same training. Further, DoD will no longer be responsible for granting or loaning equipment. This training, therefore, could best be completed by the agency responsible for issuing the equipment. Recommend deletion.
- **Roles 73, 75, and 76—Establish and Maintain WMD Training Centers (pp. xl, 24, and 34-35)**—With the DoD Domestic Preparedness Program transferring to DoJ, the DoJ is now responsible for fulfilling this role. The DoJ has in fact established a consortium including universities and experts to create a training facility at Fort McClellan. Recommend deletion.
- **Role 74—Train National Guard Personnel in HAZMAT and ICS (pp. xl, 24, and 34)**—This training is expensive and time consuming. While suitable for the RAID team members, it is unclear what benefit it would be to train the general NG. Recommend deletion on this role.

Comments on Task 4.0 (pp 84-135), National Guard WMD Study

- **Product 1—List of Equipment and Technology (E/T) Approaches (p. 88)**—A very convoluted manner of identifying needs and matching them to technology. This process is duplicative of existing programs (TSWG and CBDP). It is further compounded by the problem of not distinguishing between civilian and military requirements and programs. Recommend deletion, as it is duplicative of existing programs.
- **Product 2—Equipment and Technology Database (pp. 88-92)**—To ensure that Product 1 can be accomplished, Product 2 provides an industry science and technology database. Again, this exists in the CB defense community. Instead of duplicating or "tweaking," the National Guard should become a customer of these organizations through the CBDP—the civilians can utilize the TSWG. Recommend deletion.
- **Product 3—List of Processes for Determining Needs (pp. 93-95)**—The NG is not the acquisition and technology organization, let alone organized to handle the complex technology and procurement issues associated with CB defense equipment, and should limit itself to providing operational feedback into the existing organizations, TSWG and CBDP. An additional role, identified on page 95, is to be the link for the first responder community to the Congress. This is an inappropriate lobbying role. It also shortcuts the separation of Federal, state, and local agencies. Recommend deletion.
- **Product 4—List of Identified Needs (p. 95)**—This is a current snapshot that may be useful to the TSWG or the NDPO in understanding the needs and potential gaps in the response.

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community. Recommend forwarding the resulting appendix to the appropriate organizations, TSWG and NDPO.

- **Product 5—Potential Roles for Meeting Needs (pp. 96-97)**—Similar to the comments to Product 3 above. The NG is not the acquisition and technology community nor does it have resident CB R&D capabilities. Suggest that the NG provide operational feedback resulting from RAID operations, joint civilian and military exercises, and RAID Team interaction with the emergency responder community to the proper organizations—TSWG for civilians and CBDP for service. Any specific role beyond this will be on a case-by-case, tasking basis (participation in ACTDs, for example).
- **Product 6—Potential Roles for the Acquisition Process (pp. 97-98)**—Please refer to the table on page 97. Proposals do not take into account the Standardized Equipment List (SEL) or the DoJ NDPO. Suggest this section be scrubbed again taking these recent changes into account and to gain clarity on the existing gaps, as those identified are OBE. Further, there appears to be a misunderstanding of the TSWG and its capabilities. Information on this program should be used to restructure this section. Also recommend the NG limit its role to the comments made above on Product 3 and 5.
- **Product 7—Combined List of Evaluated Roles (p. 98)**—This process should have been completed before publishing the first draft. A more helpful and insightful approach would have been a peer evaluation by DoD agencies involved in CB. This table is critical in the final draft and should incorporate the above comments in the pro and con sections.
- **Product 8—Functional Decision Packages (pp. 99-133)**—These packages combine many of the roles to meet some previously identified needs.
 - **Package 1—WMD Defense Facilitator (pp. 100-106)**—
 - Roles eliminated in the supplementary document at TAB C: Role 1, CB Defense Resource Facilitator; Role 7, Federal Funding Conduit; Role 8, Equipment Certification; and Role 13, Information Clearinghouse.
 - Roles recommended for deletion or modification above: Role 2, Interagency Coordinator; Role 3, Dual-Use Watchdog; Role 5, Requirements Aggregation; Role 11, Standard Buy List; and Role 12, Acquisition Management Oversight for Emergency Responders.
 - Roles remaining in Package 1: Role 4, TSWG Representative, and Role 6 Interoperability Coordinator. These remaining roles are proper responsibilities for the National Guard to take on. The input into the TSWG will be critical for this Federal body to understand the needs of the emergency responders. The role of Interoperability Coordinator may change, as the NDPO becomes fully operational.
 - **Package 2—Technology Information Center (pp.106-109)**—
 - Roles eliminated in the supplementary document at TAB C: Role 8, Equipment Certification, and Role 16, Threat Assessment Tools.
 - Roles recommended for deletion or modification above: Role 2, Interagency Coordinator; Role 3, Dual-Use Watchdog; and Role 11, Standard Buy List.

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- Roles remaining in Package 2: Role 4, TSWG Representative, and Role 6, Interoperability Coordinator. These remaining roles are duplicative of Package 1.
- Package 3—Interoperability Catalyst (pp. 109-115)—
 - Roles eliminated in the supplementary document at TAB C: Role 8, Equipment Certification, and Role 7, Federal Funding Consult.
 - Roles recommended for deletion or modification above: Role 2, Interagency Coordinator; Role 5, Requirements Aggregation; Role 9, Modeling and Simulation Certification; Role 69, Provide Specialized Training; and Role 10, Modeling and Simulation Interoperability Coordinator.
 - Roles remaining in Package 3: Role 6, Interoperability Coordinator; Role 16, Augment C4ISR Infrastructure; and Role 70, Joint Exercise Coordinator. These roles more accurately reflect the strengths of the National Guard and are comparable to its current roles in assistance to state and local authorities.
- Package 4—National Training Facilitator (pp. 115-119)—
 - Roles eliminated in the supplementary document at TAB C: Role 13, Information Clearinghouse; Role 14, Exercise and Training Augmentation; and Role 71, Coordinate Exercise/Training Grants.
 - Roles recommended for deletion or modification above: Role 5, Requirements Aggregation; Role 15, Exercise Automation; Role 69, Provide Specialized Training; Role 75, Establish WMD Training Center; and Role 76, Conduct WMD Training.
 - Roles remaining in Package 4: Role 6, Interoperability Coordinator; Role 30, RAID Team Sustainment; Role 70, Joint Exercise Coordinator; and Role 72, Develop and Manage Training Scenario Templates. Would only add a note of caution on the last two roles. These roles may come under the purview of the NDPO and, therefore, should be negotiated with the NSC and DoD PDD-62 Management Structures.
- Package 5—Minuteman Analysis Network (pp. 119-126)—
 - Roles eliminated in the supplementary document at TAB C: Role 18, NDII Modeling and Simulation Facilitator, and Role 29, WMD/Terrorism Subject matter Expert Database.
 - Roles recommended for deletion or modification above: Role 2, Interagency Coordinator; Role 3, Dual-Use Watchdog; Role 5, Requirements Aggregation; Role 9, Modeling and Simulation Certification; Role 15, Exercise Automation Support; Role 69, Provide Specialized Training; Role 70, Joint Exercise Coordinator; Role 73, Establish WMD Training Centers; and Role 76, Conduct WMD Defense Training.
 - Roles remaining in Package 5: Role 72, Develop Scenario Templates, and Role 77, Train Selected Personnel for Response Exercises. The remaining roles for the National Guard more closely reflect past assignments and eliminate the potentially resource intensive roles. Further, much of this package identifies

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modeling and simulation responsibilities, an area where the Guard does not have much expertise.

- **Package 6—Resource Stockpile manager (pp. 125-131)—**
 - Roles eliminated in the supplementary documents: **TAB C: Role 30, Stockpile CB Medical Supplies and Equipment, and Role 22, Contractor Reserve Equipment.**
 - Roles recommended for deletion or modification above: **Role 12, Acquisition Management Oversight for Emergency Responders, and Role 51, Distribute Consumable Resources.**
 - Roles remaining in Package 6: **Role 32, Mobile Emergency Care Clinics; Role 40, Refugee Management; Role 49, Employ Specialized Equipment; and Role 51, Distribute Consumable Resources.** These roles reflect the traditional roles of the Guard with some outgrowth in the CB arena. Package 6 represents the least problematic package of options.
- **Package 7—Test and Evaluation Coordinator—**
 - Roles eliminated in the supplementary documents: **TAB C: Role 8, Equipment Certification, and Role 14, Evaluation Metrics Coordination.**
 - Roles recommended for deletion or modification above: **Role 3, Dual-Use Watchdog, and Role 9, Modeling and Simulation Certification.**
 - Roles remaining in Package 7: **None. Recommend deletion of this package.**